

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC)	
)	
Plaintiff,)	Civil Action No.: 6:20-cv-879 (ADA)
)	
v.)	Jury Trial Requested
)	
TARGET CORPORATION)	
)	
Defendant.)	
)	

DECLARATION OF RICHARD MCCAULLEY

I, Richard McCaulley, subject to the laws concerning perjury, hereby submit this Declaration pursuant to 28 U.S.C. § 1746 and state as follows:

1) My name is Richard McCaulley. I am over 18 years of age, of sound mind, and competent in all respects to make this Declaration. I have personal knowledge, or knowledge based on my review of records that are within my custody and control, of all the matters stated herein, and they are all true and correct.

2) I am one of the attorneys representing Plaintiff, Proxense, LLC, in the above-referenced matter. During the course of litigation in the above-referenced matter, I obtained and discovered information in connection with this lawsuit. Accordingly, I have learned of and became aware of the following documents in my role as counsel for Plaintiff in the above-referenced matter.

3) Attached hereto as Exhibit 1 is a true and correct copy of United States Patent Number 10,455,533.

4) Attached hereto as Exhibit 2 is a true and correct copy of Target-Proxense-PA_0011064-065 as provided by counsel for Defendant, Target Corp.

5) Attached hereto as Exhibit 3 is a true and correct portion of Defendant Target's Invalidity Contentions.

6) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on the 24th day of May, 2021, in Reno, Nevada.

/s/ Richard McCaulley

Richard McCaulley